

EDPS Record of Processing Activity

Record of EDPS activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

Nr.	Item	Description
Processing of personal data in the EDPS public-key infrastructure (PKI)		
1.	Last update of this record	25.11.2025
2.	Reference number	76
3.	Name and contact details of controller	<p>European Data Protection Supervisor (EDPS) Postal address: Rue Wiertz 60, B-1047 Brussels Office address: Rue Montoyer 30, B-1000 Brussels Telephone: +32 2 283 19 00 Email: edps@edps.europa.eu</p> <p>Operational controller: Technology and Privacy Unit, Digital Transformation Sector, EDPS IT EDPS-IT@edps.europa.eu</p>

Document info

Roles & Contact Details

Nr.	Item	Description
		Contact form for enquiries on processing of personal data to be preferably used: https://www.edps.europa.eu/about-edps/contact_en
4.	Name and contact details of DPO	dpo@edps.europa.eu
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor (where applicable)	<p>The European Parliament DG ITEC is a processor for this processing activity. It:</p> <ul style="list-style-type: none"> ○ Provides, manages, maintains the Linux VM (including the backup) that hosts the EDPS PKI ○ Provides technical support to the EDPS T&P - Digital Transformation Sector <p>EP DPO contact: data-protection@ep.europa.eu</p>
7.	Short description and purpose of the processing	<p>The EDPS IT collects and uses personal data to support the production of digital certificates attesting to the identity of the holder (the data subject).</p> <p>Possession of the digital certificate counts as proof of identity for the purpose of authentication in the Case Management System (CMS) application, for sending and receiving S/MIME encrypted emails, and for signing documents in electronic form, in accordance with the EDPS Acceptable Use Policy for electronic signatures for these particular digital certificates.</p> <p>In order for digital certificates to fulfil the aforementioned functions, the system must record information on the identity of the natural persons to whom certificates are issued.</p>

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		<p>The public-key infrastructure (PKI) is the system to support the issuing, renewal and revocation of certificates. It is maintained and managed by the EDPS, Technology and Privacy Unit, Digital Transformation Sector. It is hosted at the European Parliament (EP) in one of the isolated EP's private networks. The EP DG ITEC agreed to implement network filters so that the EDPS PKI is accessible only to the EDPS staff.</p> <p>EDPS staff members receive a digital certificate if their role requires so.</p> <p>All interactions with the PKI are logged in the access log for security purposes.</p>
8.	Description of categories of persons whose personal data is processed and list of data categories	<p>To generate the digital certificates, personal data of EDPS staff is processed.</p> <p>The following data categories are processed:</p> <ul style="list-style-type: none"> • Professional email address • Username • Organisational entity (EDPS and Fabasoft) • Public-private key per for encryption and electronic signatures
9.	Time limit for keeping the data	<p>The personal data of EDPS staff members are processed in the PKI for the duration of their employment relation with EDPS, for digital certificate renewal or re-issuing. Once a staff member leaves the EDPS, the digital certificate is revoked, so that it can no longer be used to access CMS; the email address of the staff member remains in</p>

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		<p>the PKI, embedded in the expired and / or revoked digital certificates, but cannot be further used for other activities.</p> <p>The overall time limit for which the expired and revoked certificates are kept in the PKI is 30 years, which is the time frame in order to keep an exhaustive and secure Certificate Revocation List.</p>	
10.	Recipients of the data	<ul style="list-style-type: none"> - The EDPS shares public keys of their users via the SECABC IT platform with participating European institutions, Bodies and Agencies (EUIBAs) to facilitate end-to-end encryption of emails. https://www.edps.europa.eu/system/files/2024-06/24-05-12_edps_data_protection_notice_secabc_en.pdf - The European Parliament in its role as service provider for the EDPS - Bodies charged with a monitoring or inspection task under EU law, where required for official investigations or for audit purposes; - The Court of Justice of the European Union, where relevant 	Recipients
11.	Are there any transfers of personal data to third countries or to international organisations? If so, to which ones and with which safeguards?	There are no transfers outside of EU/EEA.	Transfers

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12.	General description of security measures, where possible.	<p>The PKI benefits from a number of security measures (non-exhaustive list):</p> <ul style="list-style-type: none"> • distinct environments for acceptance testing and production • authentication of privileged users with client-side certificates and of other users also with auto-generated random passwords • reachable only via EP corporate network (thus PKI isolated from Internet) • exported certificates are protected by auto-generated complex passwords • user certificate lifetime limited to one year • last-resort certificate recovery to ensure access to encrypted corporate emails • acceptable use policy covering use certificates for CMS, mail encryption and digital signatures
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	<p>https://www.edps.europa.eu/data-protection/our-work/publications/data-protection-notices-records/2025-11-21-data-protection-notice-processing-personal-data-edps-public-key-infrastructure-pki_en</p>

Security

Data Protection Notice